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STATE OF HAWAII

PUBLIC UTILITIES COMMISSION

465 S. KING STREET, #103 HONOLULU, HAWAII 96813

September 11, 2019

JAMES P. GRIFFIN CHAIR

JENNIFER M. POTTER COMMISSIONER

LEODOLOFF R. ASUNCION, JR. COMMISSIONER

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SEP 172019

FCC Mailroom

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 – 12th Street, SW Washington, DC 20554

POCKET FILE COPY ORIGINAL

USAC Vice President of the High Cost Division 700 12th Street, NW, Suite 900 Washington, DC 20005

Re: CC Docket No. 96-45/WC Docket No. 14-58, Annual State Certification of Support for Eligible Telecommunications Carriers Pursuant to 47 Code of Federal Regulations ("C.F.R.") Section 54.314

Dear Ms. Dortch and USAC's Vice President of the High Cost Division:

Pursuant to the requirements of 47 C.F.R. § 54.314, the Public Utilities Commission of the State of Hawaii hereby certifies to the Federal Communications Commission and the Universal Service Administrative Company that Hawaiian Telcom, Inc. ("HTI") is eligible to receive federal high-cost support for the program years cited.

The Public Utilities Commission of the State of Hawaii certifies for HTI that all federal high-cost support provided to HTI within Hawaii was used in the preceding calendar year (2018) and will be used in the coming calendar year (2020) only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. See the enclosed D&O No. 36510.

¹47 C.F.R. § 54.314(a) ("<u>Certification</u>. States that desire eligible telecommunications carriers to receive support pursuant to the high-cost program must file an annual certification with the Administrator and the Commission stating that all federal high-cost support provided to such carriers within that State was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. High-cost support shall only be provided to the extent that the State has filed the requisite certification pursuant to this section").

Marlene H. Dortch, Office of the Secretary

USAC, Vice President of the High Cost Division September 11, 2019 Page 2

Applicant	Study Area Code
HTI	623100

If this letter does not fully satisfy the requirements for state certification of carriers to receive federal universal service support, we respectfully request a waiver of the October 1, 2019 deadline to correct any deficiencies.

Please contact Jodi Endo Chai, Executive Officer, at (808) 586-2020 to address any questions on this matter.

Sincerely,

Melissa Mash

Commission Counsel

MM:mho

Enclosure

c: Dean Nishina, Division of Consumer Advocacy (w/o enclosure) Steven P. Golden, HTI (w/o enclosure)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF HAWAII

----In the Matter of----

PUBLIC UTILITIES COMMISSION

DOCKET NO. 2019-0060

Instituting a Proceeding to
Investigate Whether Designated
Eligible Telecommunications
Carriers Participating in the
High-Cost Program of the
Universal Service Fund Should be
Certified By the Commission
Pursuant to 47 Code of Federal
Regulations § 54.314(a).

DECISION AND ORDER NO. 36510

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BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF HAWAII

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----In the Matter of----

PUBLIC UTILITIES COMMISSION

Instituting a Proceeding to Investigate Whether Designated Eligible Telecommunications Carriers Participating in the High-Cost Program of the Universal Service Fund Should be) Certified By the Commission Pursuant to 47 Code of Federal Regulations § 54.314(a).

Docket No. 2019-0060

Decision and Order No. 36510

DECISION AND ORDER

The objective of this docket is for the commission to: (1)determine whether eligible the telecommunications carrier ("ETC") parties1 have each sufficiently complied with the annual ETC certification requirements pertaining to the provision of certain reports established by the commission in Decision

The "ETC Party" to this proceeding is HAWAIIAN TELCOM, INC. ("HTI"). The "Parties" to this proceeding are the ETC Party and the DEPARTMENT OF COMMERCE AND CONSUMER DIVISION OF CONSUMER ADVOCACY ("Consumer Advocate"), an ex officio party, pursuant to Hawaii Revised Statutes § 269-51 and Hawaii Administrative Rules § 16-601-62(a). See: (1) Order No. 36222, "Initiating Investigation," filed in this docket on March 22, 2019 ("Order Initiating Investigation" or "Order No. 36222") at 4-9. No persons timely moved to intervene or participate in this proceeding.

and Order No. 30932, filed on December 28, 2012, in Docket No. 2011-0052 ("Order No. 30932"); and (2) determine whether to certify to the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC") that all federal high-cost support provided to the ETCs in the state of Hawaii ("State") participating in the federal high-cost support program of the universal service fund ("USF") was used in the preceding calendar year, and will be used in the coming calendar year, only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Title 47 of the C.F.R. § 54.314(a) ("§ 54.314(a) certification").3

 $^{^2{\}rm The}$ annual ETC certification requirements are codified at 47 Code of Federal Regulations ("C.F.R.") § 54.313, "Annual reporting requirements for high-cost recipients," and are hereafter referred to in this Order as the "Annual Reporting Requirements."

³Pursuant to 47 C.F.R. § 54.314(a), "[s]tates that desire eligible telecommunications carriers to receive support pursuant to the high-cost program must file an annual certification with the Administrator and the Commission stating that all federal high-cost support provided to such carriers within that State was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended."

In determining whether to provide § 54.314(a) certification to the FCC and the USAC, the commission, based on the record, must be satisfied that there is no uncertainty as to whether all federal high-cost support provided to the ETC party was used and will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, pursuant to 47 C.F.R. § 54.314(a). This finding is critical to

As discussed below, in this Decision and Order ("Order"), the commission determines that HTI has sufficiently complied with the Annual Reporting Requirements, and, based on the record, the commission is satisfied that there is no uncertainty as to whether all federal high-cost support provided to HTI was used and will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, pursuant to 47 C.F.R. § 54.314(a).

The commission concludes that it should certify HTI as a USF high-cost ETC in 2019.

I.

BACKGROUND

Throughout recent years, the commission has designated:

(1) HTI; (2) CORAL WIRELESS, LLC, formerly doing business as MOBI

PCS ("Coral"); (3) SANDWICH ISLES COMMUNICATIONS, INC., ("SIC");

and (4) SIC's affiliate, PA MAKANI LLC, dba SANDWICH ISLES WIRELESS

("Pa Makani") as ETCs to take part in the high-cost support program

of the USF.4

a commission determination that an ETC designation "is in the public interest." Order No. 30932 at 29.

⁴However, in 2015 and 2016, the commission determined that there was uncertainty regarding whether all federal high-cost support provided to SIC and Pa Makani was used and would be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, pursuant

On May 24, 2017, the commission issued Order No. 34568 "Initiating Investigation," in Docket No. 2017-0126 ("Order No. 34568"). The commission named HTI and Coral⁵ as parties to the docket, to determine whether they should be certified by the commission in 2017, pursuant to 47 C.F.R. § 54.314(a).⁶ The commission concluded, among other things, that: there was no

The commission made a similar determination relating to Coral in 2016. See: Order No. 33167 (for background), certifying HTI and Coral only; and Order No. 33955, certifying HTI only.

Thereafter, on December 12, 2016, Coral filed a letter request in Docket No. 2016-0417 to surrender its amended certificate of registration ("COR") to provide facilities-based and resold wireless telecommunications services in the State. Coral also advised the commission that it had ceased all operations in the State, and that it had no plans to re-enter the market.

5The commission's determination in Order No. 33167, that Coral should be provided with § 54.314(a) certification in 2015, allowed Coral to receive federal high-cost support in 2016. The commission named Coral as a party in Docket No. 2017-0126, because part of determining whether to provide § 54.314(a) certification of an ETC in 2017 depended upon whether all federal high-cost support provided to the ETC in the preceding year (i.e., in 2016) was used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, pursuant to § 47 C.F.R. 54.314(a).

⁶Order No. 34568 at 7. SIC and Pa Makani did not receive federal high-cost support in 2016. <u>See</u> Order No. 33167 at 5 and 29-30. Neither SIC nor Pa Makani moved to intervene in Docket No. 2017-0126.

to 47 C.F.R. § 54.314(a), and as such, concluded that § 54.314(a) certification of SIC and Pa Makani could not be made to the FCC and the USAC at that time. See: Decision and Order No. 33167, filed on September 28, 2015, in Docket No. 2015-0083 ("Order No. 33167"); and Decision and Order No. 33955, issued on September 30, 2016, in Docket No. 2016-0093, Docket No. 2016-0120, and Docket No. 2016-0121 (Consolidated) ("Order No. 33955").

uncertainty as to whether all federal high-cost support provided to HTI was used and would be used only for the provision, maintenance, and upgrading of facilities and services for which the support was intended, pursuant to 47 C.F.R. § 54.314(a), and as such, HTI should be certified by the commission as a USF high-cost ETC in 2017; and there was no uncertainty that all federal high-cost support provided to Coral was used only for the provision, maintenance, and upgrading of facilities and services for which the support was intended, pursuant to 47 C.F.R. § 54.314(a).7

The commission similarly concluded, among other things, that: there was no uncertainty as to whether all federal high-cost support provided to HTI was used and would be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, pursuant to 47 C.F.R. § 54.314(a), and as such, HTI should be certified by the commission as a USF high-cost ETC in 2018.8

⁷Order No. 34568 at 3. Thereafter, on September 29, 2017, the commission issued Decision and Order No. 34850, in Docket No. 2016-0417 ("Order No. 34850"), wherein it approved Coral's voluntary surrender of its amended COR to provide facilities-based and resold wireless telecommunications services within the State.

⁸See Decision and Order No. 35689, issued on
September 14, 2018, in Docket No. 2018-0113.

Current Proceeding

On March 22, 2019, the commission instituted investigation to determine whether State-designated ETCs participating in the high-cost support program of the USF should be certified by the commission in 2019, pursuant to 47 C.F.R. § 54.314(a).9 As the commission noted in Order No. 36222, the federal rules require state commissions that desire ETCs to receive USF high-cost support to annually submit a certification to the FCC and the USF administrator, USAC, that the ETCs have used and will use the support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. 10

By Order No. 36222, the commission established procedural deadlines for this proceeding, based on certain FCC filing deadlines, including the October 1, 2019 federal deadline for state certification of USF high-cost support program recipients.

The Consumer Advocate timely filed its Statement of Position ("SOP") on August 2, 2019, and therein concluded that HTI "has provided sufficient information to justify its

⁹See Order No. 36222 at 1.

¹⁰Order No. 36222 at 2. See also 47 C.F.R. § 54.314(a).

certification" as a state-designated ETC participating in the high-cost support program of the Federal USF for 2020, pursuant to 47 C.F.R. § 54.314(a). 11 HTI did not file a Statement of Position.

Order No. 36222 established August 9, 2019, as the deadline for the Parties to file Simultaneous Reply Statements of Position. 12 By letter dated and filed on August 8, 2019, the Consumer Advocate informed the commission that it would be relying upon the positions provided in its SOP in lieu of filing a Reply Statement of Position. HTI did not file a Reply Statement of Position.

For the reasons which follow, the commission, by this Order, determines that HTI has sufficiently complied with the Annual Reporting Requirements. Based on the record, the commission is satisfied that: there is no uncertainty as to whether all federal high-cost support provided to HTI was used and will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, pursuant to 47 C.F.R. § 54.314(a).

Accordingly, the commission certifies to the FCC and the USAC that HTI has used and will use the USF high-cost support for

¹¹Consumer Advocate SOP at 1-2.

¹²Order No. 36222 at 11.

the purposes for which the support is intended, consistent with 47 C.F.R. § 54.314(a).

II.

DISCUSSION

In Order No. 30932, the commission adopted the Annual Reporting Requirements for State-designated ETCs participating in the USF's high-cost program. These requirements superseded the annual ETC certification requirements previously adopted by the commission on an interim basis in Order No. 30230, filed on February 27, 2012, in Docket No. 2011-0052, which amended the commission's formerly-adopted ETC certification requirements in "Decision and Order No. 22228," filed on January 17, 2006, in Docket No. 05-0243.

The Annual Reporting Requirements (individually, "Reporting Requirement") adopted by the commission in Order No. 30932 are as follows:

A. Federal Reporting Requirements Applicable to All ETCs Other Than Lifeline-Only ETCs

The following federal reporting requirements shall apply to all ETCs in Hawaii other than Lifeline-only ETCs:

¹³These requirements do not apply to ETCs designated by the commission for the limited and sole purpose of participating in the USF Lifeline program, known as Lifeline-only ETCs. See Decision and Order No. 30932 at 9-13 and 32.

- 1. Provide a copy of all of the ETC's current year filings to the FCC required by 47 C.F.R. Sections 54.313 (annual reporting requirements for high-cost recipients) and 54.1009 (annual reports).
- 2. Any carrier affected by the cap shall provide a discussion on whether the carrier has sought or plans to seek a waiver from the \$250/line/month cap on universal service support as specified in 47 C.F.R. § 54.302. If a waiver has been requested, provide the status of the waiver.
- B. Additional Hawaii Reporting Requirements
 Applicable to All ETCs Other Than
 Lifeline-Only ETCs

The following additional reporting requirements shall apply to all ETCs in Hawaii other than Lifeline-only ETCs:

- 1. Provide the percentage of all out-of-state troubles cleared within twenty-four hours of the time such troubles are reported. The standard for this is a minimum of ninety-five percent cleared within twenty-four hours.
- 2. Provide the number of customer trouble reports per one hundred lines per month. The standard for this is no more than six customer trouble reports per one hundred lines per month.
- 3. Provide a certification that the carrier will promptly notify its customers, and as appropriate, law enforcement and fire agencies that will be affected when its service will be interrupted for scheduled repairs or maintenance, or if the occurrence of an interruption in service is otherwise known to the carrier.
- 4. Any ETC that is already filing with the commission the information detailed in Paragraph Nos. 1 to 3, above, on an annual

or more frequent basis, is not required to resubmit that information.

Pursuant to 47 C.F.R. § 54.314(a), "States that desire eligible telecommunications carriers to receive support pursuant to the high-cost program must file an annual certification with the Universal Service Administrator and the FCC stating that all federal high-cost support provided to such carriers within that State was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended."

To assist with the identification of the benefactors of federal high-cost support, excluding frozen Interstate Access Support ("IAS") that is not required to be used for deploying broadband services, ETCs shall provide the following information:

- 1. The number of locations or customers in each wire center or census block within its ETC service area for the previous calendar year and the anticipated number of locations or customers in each wire center or census block for the coming calendar year;
- 2. The services available to locations or customers in each wire center or census block within its ETC service area for the previous calendar year and the anticipated services available to locations or customers in each wire center or census block for the coming calendar year; and
- 3. In addition to the information provided on its progress report pursuant to 47 C.F.R. § 54.313(a)(1):
 - a. Identify all capital, operating and maintenance expenditures for which the carrier has received universal high-cost support for the previous calendar year, broken down to the wire centers or census blocks, as appropriate.

- An update on the status of projects b. that were planned for the previous calendar year. For each project, provide: of universal high-cost amount support utilized; a discussion of whether bidding was utilized; competitive any project a discussion of whether awarded contracts were related affiliated to the carrier entities or in which an officer of the entity is related to an officer of the carrier; a discussion of whether the project plans were changed, and if so, the reasons why; maps detailing the location of project as well as the wire centers blocks of the affected census customers; an explanation of the project it was used to improve and how service quality, coverage, or capacity intended benefactors; improvements in service supporting coverage, orcapacity. quality, Beginning July 1, 2013, separate progress reports shall be provided for voice and broadband service, to the extent required by federal law.
- c. For the coming calendar year, identify all anticipated capital, operating, and maintenance expenditures on projects that the carrier plans to seek federal high-cost support for, broken down to the wire center level or census block, as appropriate;
- d. coming calendar For the year, maps detailing the location of project and the wire center or census block of the affected locations customers, an explanation of the project and how it will be used to improve service quality, coverage, or capacity for the intended benefactors, and the data supporting the quantification of the Beginning June 1, 2013, benefactors. reports shall progress separate broadband provided for voice and

- service to the extent required by federal law; and
- e. If in the final year of high-cost support, plans for the following (i.e., future) calendar years are not required.
- 4. Pursuant to 47 C.F.R. § 54.320, provide a certification that the carrier will retain, for at least ten years, all records required to demonstrate to auditors that the support received was consistent with the universal service high-cost program rules and that these documents will be available upon request to the FCC and any of its bureaus or offices, Universal Service Administrative Company, and their respective auditors.
- C. Requirements for an Incumbent Local Exchange Carrier or a Rural Local Exchange Carrier

To confirm whether the carrier is or will charge a limited monthly access recovery charge on its wireline service, carriers are to provide a list of the monthly access recovery charge for each of the carrier's class of service.

Order No. 30932 at 9-13 (citation omitted).

In addition, the commission required that ETCs providing service on Hawaiian Home Lands provide redacted, non-confidential copies of their annual ETC certification reports to the Department of Hawaiian Home Lands ("DHHL") and the Office of Hawaiian Affairs ("OHA"). 14 The commission's review

¹⁴See Order No. 30932 at 32.

Regarding the Annual Reporting Requirements, the commission stated that because certain requirements need to be re-evaluated to determine applicability and how to measure them given the changes in the telecommunications industry in the State

of HTI's filings submitted for certification to receive USF high-cost support is discussed in the sections below.

Α.

HTI

HTI is the State's incumbent local exchange carrier, providing a "comprehensive slate" of local and "intraLATA" telecommunication services, statewide. In 1997, the commission approved HTI's application for designation as an ETC to receive federal USF support, effective January 1, 1998. 16

HTI filed its ACR report with the commission on May 1, 2019, 17 requesting that the commission certify to the FCC

and nationwide, the commission will view the service related requirements of the ETC certification requirements to be targets for achievement as opposed to strict standards, until determined otherwise. Decision and Order No. 31745, filed on December 12, 2013, in Docket No. 2013-0066, at 20-21.

¹⁵See In re Hawaiian Telcom, Inc., Docket No. 2010-0314, Decision and Order, filed on December 22, 2010. See also In re Hawaiian Telcom, Inc., Docket No. 2015-0351, Decision and Order No. 33316, filed on November 4, 2015. Pursuant to Newton's Telecom Dictionary (30th ed. 2016), intraLATA refers to telecommunications services that originate and terminate in the same Local Access and Transport Area.

¹⁶See In re GTE Hawaiian Telephone Company, Incorporated, Docket No. 97-0363, Decision and Order No. 16111, filed on December 4, 1997. HTI was formerly known as GTE Hawaiian Telephone Company, Incorporated.

¹⁷See Hawaiian Telcom, Inc.'s Annual Certification Requirements Report for the Year Ending December 31, 2018, Confidential Attachments A-E, Certification of Steven P. Golden,

and USAC that it is eligible to receive USF support in accordance with the FCC's rules.

With regard to the applicable certification requirements set forth in Order No. 30932, HTI provided the necessary information, or indicated how the requirements are currently inapplicable. For instance, HTI filed its Annual Reporting Requirements for High-Cost Recipients with the commission on July 1, 2019, in accordance with the Regulatory Schedule in Order No. 36222.18 HTI further states that it "is not affected" by the \$250/line/month cap on USF support as specified in 47 C.F.R. § 54.302, and therefore, the reporting requirement is not applicable to it.19

HTI provides additional information regarding:

(1) the number of its locations or customers in each wire center

Verification, and Certificate of Service, filed on May 1, 2019 (collectively, also referred to as "HTI Report"). Consistent with the commission's requirement, a copy of HTI's Report was served on DHHL and OHA. See HTI Report, Certificate of Service. Hereinafter, reference to the HTI Report includes and incorporates Confidential Attachments A, B and E, filed by HTI on June 7, 2019.

¹⁸As it relates to its obligations under Reporting Requirement A(1) regarding the reporting required by 47 C.F.R. § 54.313, HTI filed copies of its FCC Form 481 (certified and filed with the USAC on July 1, 2019), and its Rate Floor Data Collection Form (submitted to the FCC and the USAC on June 18, 2019) with the commission on July 1, 2019.

 $^{^{19}\}underline{See}$ HTI Report at 6, which relates to Reporting Requirement A(2).

or census block within its service area for the previous calendar year, and the anticipated number of locations or customers in each wire center or census block for the coming calendar year;

(2) the services available to locations or customers in each wire center or census block within its service area for the previous calendar year, and the anticipated services available to locations or customers in each wire center or census block for the coming calendar year;

(3) all capital, operating, and maintenance expenditures for which high-cost support was received for the previous calendar year, by wire center or census block; and (4) updates on the status of projects planned for the previous calendar year.²⁰

Included among other things in HTI's Report is the Certification of its Vice President, External Affairs, Steven P. Golden, who provides the necessary certifications regarding notification of planned service interruptions for repairs or maintenance, and regarding retention of records in response to Reporting Requirements B(3) and B(4)(4).²¹ As it relates to Reporting Requirement C (applicable to the incumbent

 $^{^{20}}$ The above-referenced information, which relates to Reporting Requirements B(4)(1) through B(4)(3), was filed by HTI on May 1, 2019, and on June 7, 2019 (as confidential attachments A, B, and E), and thus, shall not be further described herein.

²¹See HTI Report, Certification of Steven P. Golden at 1-2.

LEC or a rural LEC), HTI states that it initiated an access recovery charge ("ARC") on its wireline services, effective July 3, 2012, and provides its current ARC rates.²²

In its SOP, the Consumer Advocate recommended that HTI should be certified as a State designated ETC participating in the high-cost support program of the Federal USF for 2019 and 2020, pursuant to 47 CFR § 54.314(a).²³

Based on the foregoing, the commission concludes that HTI has sufficiently complied with the Annual Reporting Requirements adopted in Order No. 30932. As noted by the Consumer Advocate, HTI has provided the requisite information and certifications mandated by the commission, as applicable.

HTI has complied with the Annual Reporting Requirements, and based on the record, the commission is satisfied that there is no uncertainty as to whether all federal high-cost support provided was used and will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is

²²See HTI Report at 9-10.

²³See Consumer Advocate SOP at 3. HTI did not file a Statement of Position or a Reply Statement of Position. By letter dated and filed on August 8, 2019, the Consumer Advocate informed the commission that it would be relying upon its SOP in lieu of filing a Reply Statement of Position. By letter dated and filed on September 4, 2019, HTI provided notice that it would not be submitting a Reply Statement of Position.

intended, and, thus, certification is in the public interest. Therefore, pursuant to 47 C.F.R. § 54.314(a), the commission certifies HTI as a high-cost ETC in 2019.

В.

Summary of Findings and Conclusions

Based on its review of the entire record, the commission finds that (1) HTIhas sufficiently complied with the Annual Reporting Requirements adopted by the commission Decision and Order No. 30932; and (2) there is no uncertainty as to whether all federal high-cost support provided to HTI was used and will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, pursuant to 47 C.F.R. § 54.314(a). As such, the commission concludes that HTI should be certified by the commission as a USF high-cost ETC.

III.

ORDERS

THE COMMISSION ORDERS:

1. Certification pursuant to 47 C.F.R. § 54.314(a), that all federal high-cost USF support provided to HTI was used in the preceding calendar year and will be used in the coming calendar year, only for the provision, maintenance, and upgrading

of facilities and services for which the support is intended, is hereby provided to the FCC and the USAC.

2. This docket is closed, unless ordered otherwise by the commission.

DONE at Honolulu, Hawaii _____SEP - 9 2019

PUBLIC UTILITIES COMMISSION OF THE STATE OF HAWAII

James P. Griffin, Chair

Jennifer M. Potter, Commissioner

By Leodoloff R. Asuncion, Jr. Commissioner

APPROVED AS TO FORM:

Melissa M. Mash Commission Counsel

2019-0060.mho

CERTIFICATE OF SERVICE

The foregoing order was served on the date of filing by mail, postage prepaid, and properly addressed to the following parties:

DEAN NISHINA
EXECUTIVE DIRECTOR
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS
DIVISION OF CONSUMER ADVOCACY
P.O. Box 541
Honolulu, HI 96809

STEVEN P. GOLDEN
VICE-PRESIDENT, EXTERNAL AFFAIRS
HAWAIIAN TELCOM, INC.
1177 Bishop Street
Honolulu, HI 96813